

REMARKS

Upon entering the above amendments, claims 4-10, 13-18, 21, 25-31, and 34-39 will be pending with claims 34-36 being independent. Dependent claims 4, 6-8, 10, 13-17, and 21 have been amended to correct claim dependencies and cure antecedent basis errors. Claims 34-36 have been amended to include additional information clarifying information which is supported in the original specification, at least at paragraphs [0034], [0039], and [0042]. New dependent claims 37-39 have been added to recite limitations described in the specification at paragraph [0041]. No new matter is added with these amendments.

Claims 4, 5, 8, 10, 13-17, and 21 have been rejected under 35 U.S.C. § 112, second paragraph as being indefinite due to a lack of antecedent basis. Claims 4-10, 13-18, 25-31, and 34-36 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Polizzi, U.S. Patent No. 6,643,661B2 (hereinafter "Polizzi"). Reconsideration and allowance of the above-referenced application are respectfully requested in light of these amendments and the following arguments.

Rejections under 35 U.S.C. § 112, Second Paragraph

Claims 4, 5, 8, 10, 13-17, and 21 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite due to a lack of antecedent basis. Claims 4, 6-8, and 10 have been amended to depend from claim 35, which recites a method and claims 13-17, and 21 have been amended to recite from claim 34, which recites a portal. It is believed that these amendments correct the antecedent basis problem identified in the pending Office Action of September 26, 2007 (hereinafter referred to as "the Office Action"). Favorable action is requested.

Rejections under 35 U.S.C. § 102

Claims 4-10, 13-18, 25-31, and 34-36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Polizzi. This rejection is respectfully traversed. For a valid rejection under 35 U.S.C. § 102(e), a reference must describe each and every limitation of the claimed invention. It is respectfully submitted that the disclosure of Polizzi does not meet this burden for the pending claims. Independent claims 34-36 recite a method, a portal system, and an article of manufacture, respectively. Each independent claim includes the limitations that the integration layer and navigation layer reside on a first programmable machine that communicates with the

plurality of application sources in a data layer that resides on one or more additional programmable machines and that communicates over a network with the integration layer. Each of the plurality of application sources provides a navigation connector by implementing a connector interface on the one or more additional programmable machines and by generating one or more navigation nodes that represent data objects in the each one of the plurality of application sources. The connector interface is defined by the navigation service module.

The Applicant appreciatively acknowledges the extensive analysis presented in the Office Action. Polizzi discloses a system for connecting a plurality of users to a portal system that allows the users to access and process data stored in the portal system. As noted on page 3 of the Office Action, the system disclosed by Polizzi is also capable of connection to one or more back-end databases to allow a user to view and process data stored therein. However, Polizzi fails to disclose that the system is capable of consolidating and integrating the data and the functionality of different applications into a single enterprise management tool or that the system unites application-specific hierarchies in a unified, consistent hierarchy. Polizzi merely provides an interface via which data from a number of back end databases can be accessed, manipulated by the portal, and displayed or other wise provided to the user. While the system of Polizzi is also disclosed as being capable of accessing documents and other files on back end servers, it does not include the capability to provide the functionality of a variety of applications.

Furthermore, the system of Polizzi does not include functionality that operates on the back end databases themselves. The application sources in the claims at issue in the instant application include the specific limitation that a connector interface is implemented on the one or more additional programmable machines wherein the application sources reside and that communicate over a network with the first programmable machine where the integration layer and presentation layers reside. The connector interface provides navigation information to the navigation service module on the first programmable machine. The system of Polizzi does not operate in this manner, as all of the active functionality is implemented on the portal 120. The back end databases 200, 205, 210 do not implement any of the described functionality but rather merely reply to search requests or database access commands from the portal 120. In contrast, the connectors of the instantly claimed invention reside on the one or more additional programmable machines wherein the application sources reside and actively provide the application-specific hierarchies back to the navigation serve module. In this manner, the

navigation service module does not merely provide an interface via which multiple database hierarchies can be searched, but it instead combines the application specific hierarchies into a unified, consistent hierarchy via which the actual functionality of the applications sources (as opposed to merely data or documents in a database) can be accessed and used via a single interface. This functionality is not disclosed or suggested anywhere in Polizzi. As such, Polizzi cannot reasonably be construed as anticipating the subject matter claimed either in independent claims 34-36 or in dependent claims 4-10, 13-18, 21, or 25-31 which also include the above-discussed limitations regarding the navigation connectors based on dependency from one of the new independent claims.

New claims 37-39 have also been added to recite the additional limitation that the application sources can include one or more higher functionality software programs other than databases. The functionality of these software programs is presented and made available to a user via the navigation service module and the presentation layer of the subject matter in claims 34-36, respectively. As noted above, Polizzi does not disclose or suggest such capabilities of the system described therein.

Based at least on the arguments and claim amendments presented herein, it is respectfully submitted that the currently claimed subject matter is patentable. Prompt and favorable action is therefore requested.

CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment. Applicant asks that all claims be allowed.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. No fee is believed to be due, however, the Commissioner is hereby authorized to charge any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-073-UTIL/2003P00062US.

Respectfully submitted,



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